

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

**BETTY LEIVAN,**

**Plaintiff,**

**v.**

**BASF CORPORATION,**

**Defendant.**

**Case No. 5:22-cv-06065-SRB**

**DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56, Defendant BASF Corporation (“Defendant”) moves for summary judgment in its favor on all claims asserted by Plaintiff Betty Leivan (“Plaintiff”). More specifically, Defendant is entitled to summary judgment on all of Plaintiff’s claims under the Missouri Human Rights Act and Title VII of the Civil Rights Act of 1964. In support of its motion, Defendant incorporates by reference its concurrently filed Suggestions in Support of Motion for Summary Judgment.

Wherefore, Defendant respectfully requests that this Court enter summary judgment in its favor on all counts in Plaintiff’s Complaint, dismiss this matter, award Defendant its reasonable fees and costs, and enter such other relief as the Court deems appropriate.

Respectfully submitted,

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

By: /s/ Jordan Kurdi

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 17<sup>th</sup> day of April 2023, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

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